

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JOHN A. ZACCARO,

Index No.: 08-CV-3138

Plaintiff,

vs.

HASU P. SHAH, KIRIN P. PATEL, AFFORDABLE HOSPITALITY ASSOCIATES, L.P., AFFORDABLE HOSPITALITY, INC., HERSHA HOSPITALITY TRUST, HERSHA ENTERPRISES, LTD., NISH CAPITAL, INC., 3344 ASSOCIATES, LP, JOHN and MARY DOES "1" through "10", and DOE CORPORATIONS "1" through "10"

Defendants.

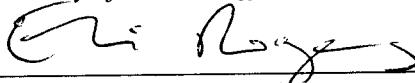
**MOTION TO ADMIT
JOANNE M. BONACCI, ESQ. PRO
HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York, I, Eli J. Rogers Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

JoAnne M. Bonacci, Esq.
Dreifuss Bonacci & Parker, LLP
26 Columbia Turnpike, North Entrance
Florham Park, New Jersey 07932
(973) 514-1414
Fax (973)514-5958

JoAnne M. Bonacci, Esq. is a member in good standing of the Bar of the States of New Jersey and Pennsylvania. There are no pending disciplinary proceeding against JoAnne M. Bonacci, Esq. in any State or Federal court.

DREIFUSS BONACCI & PARKER, LLP
Attorneys for Plaintiff, John Zaccaro


By: Eli J. Rogers (ER-6564)

One Penn Plaza, 36th Floor
New York, New York 10119

- and -

26 Columbia Turnpike, North Entrance
Florham Park, New Jersey 07932
(973) 514-1414

Dated: April 7, 2008
Florham Park, New Jersey

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOHN A. ZACCARO,

Plaintiff,

vs.

HASU P. SHAH, KIRIN P. PATEL, AFFORDABLE HOSPITALITY ASSOCIATES, L.P., AFFORDABLE HOSPITALITY, INC., HERSHA HOSPITALITY TRUST, HERSHA ENTERPRISES, LTD., NISH CAPITAL, INC., 3344 ASSOCIATES, LP, JOHN and MARY DOES "1" through "10", and DOE CORPORATIONS "1" through "10"

Defendants.

Index No.: 08-CV-3138

**AFFIDAVIT OF ELI J. ROGERS
IN SUPPORT MOTION FOR PRO
HAC VICE ADMISSION OF
JOANNE M. BONACCI, ESQ.**

STATE OF NEW JERSEY :
: ss.
COUNTY OF MORRIS :

ELI J. ROGERS, ESQ., of full age, being duly sworn according to law, upon his oath, deposes and says:

1. I am an associate of the law firm Dreifuss Bonacci & Parker, LLP, attorneys for Plaintiff, John A. Zaccaro ("Zaccaro"). I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff Zaccaro's motion to admit JoAnne M. Bonacci as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 23, 2006. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known JoAnne M. Bonacci, Esq. since May, 2004.

4. JoAnne M. Bonacci, Esq. is Partner at Dreifuss Bonacci & Parker, LLP.

5. I have found JoAnne M. Bonacci, Esq. to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of JoAnne M. Bonacci, Esq., pro hac vice.

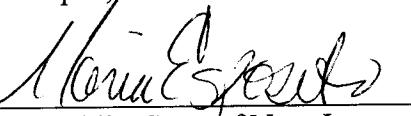
7. I respectfully submit a proposed order granting the admission of JoAnne M. Bonacci, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit JoAnne M. Bonacci, Esq, pro hac vice, to represent Plaintiff Zaccaro in the above captioned matter be granted.



ELI J. ROGERS, ESQ.

Sworn to and subscribed
before me on this 7
day of April, 2008.



Notary Public, State of New Jersey

MARIA ESPOSITO
Notary Public of New Jersey
I.D. # 2247678
Commission Expires 8/23/2012

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN A. ZACCARO,

Index No.: 08-CV-3138

Plaintiff,

vs.

HASU P. SHAH, KIRIN P. PATEL, AFFORDABLE HOSPITALITY ASSOCIATES, L.P., AFFORDABLE HOSPITALITY, INC., HERSHA HOSPITALITY TRUST, HERSHA ENTERPRISES, LTD., NISH CAPITAL, INC., 3344 ASSOCIATES, LP, JOHN and MARY DOES "1" through "10", and DOE CORPORATIONS "1" through "10"

**ORDER FOR ADMISSION OF
JOANNE M. BONACCI, ESQ. PRO
HAC VICE ON WRITTEN NOTICE**

Defendants.

Upon the motion of Eli J. Rogers, Esq. attorney for Plaintiff, John A. Zaccaro, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

JoAnne M. Bonacci, Esq.
Dreifuss Bonacci & Parker, LLP
26 Columbia Turnpike, North Entrance
Florham Park, New Jersey 07932
(973) 514-1414
fax (973)514-5958
jbonacci@dbplawfirm.com

is admitted to practice pro hac vice as counsel for Plaintiff, John A. Zaccaro, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

United States District/Magistrate Judge

Dated: _____, 2008
New York, New York

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

JOHN A. ZACCARO,

Index No.: 102874/08

Plaintiff,

vs.

HASU P. SHAH, KIRIN P. PATEL, AFFORDABLE HOSPITALITY ASSOCIATES, L.P., AFFORDABLE HOSPITALITY, INC., HERSHA HOSPITALITY TRUST, HERSHA ENTERPRISES, LTD., NISH CAPITAL, INC., 3344 ASSOCIATES, LP, JOHN and MARY DOES "1" through "10", and DOE CORPORATIONS "1" through "10"

Defendants.

PROOF OF SERVICE

ELI J. ROGERS, ESQ., affirms under penalty of perjury, as follows:

1. I am an attorney admitted to practice in the State of New York.
2. On this date I caused an original and two copies of the following:
 - a. Notice of Motion for Pro Hac Vice Admission of Joanne M. Bonacci, Esq.;
 - b. Affirmation of Sponsoring Counsel in Support Of John Zaccaro's Motion For Pro Hac Vice Admission of Joanne M. Bonacci, Esq.; and
 - c. Certificates of Good Standing

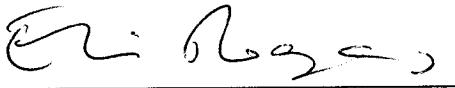
to be delivered to this Court for filing via Federal Express.

3. On this date I caused hard copies of the aforementioned papers via Federal

Express upon :

Edward A. Fleck, Esq.
1205 Franklin Avenue
Suite 300
Garden City, NY 11530

4. I affirm under penalty of perjury that the foregoing statements made by me are true, except those made upon information and belief, which I believe to be true.



Eli J. Rogers
Eli J. Rogers, Esq.

Dated: April 7, 2008
Florham Park, New Jersey

Supreme Court of New Jersey

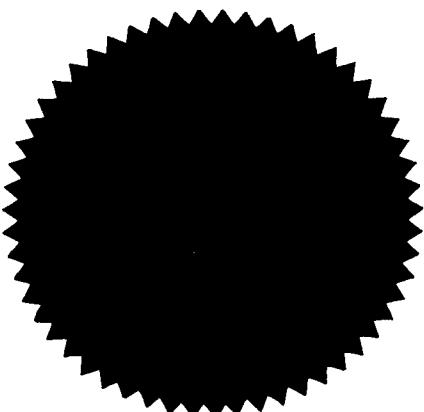


Certificate of Good Standing

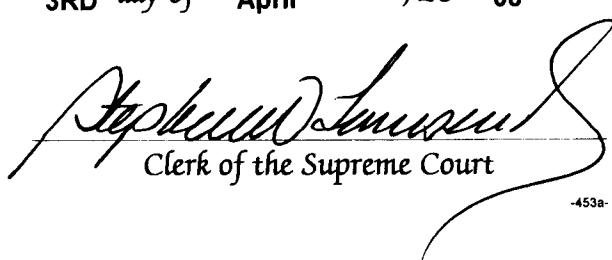
This is to certify that **JOANNE M BONACCI**
(No. **006241991**) was constituted and appointed an Attorney at Law of New Jersey on **June 06, 1991** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this
3RD day of April , 20 08


Stephen J. Cammilleri
Clerk of the Supreme Court

Certificate of Good Standing



United States of America

District of New Jersey

I, WILLIAM T. WALSH, Clerk of the United States District Court for the District of New Jersey, do hereby certify that:

Joanne M. Bonacci

was duly admitted to practice in said Court as of June 6, 1991,
and is in good standing as a member of the Bar of said Court.

Dated at Newark, New Jersey
on: April 3, 2008

WILLIAM T. WALSH, CLERK

By

Carey P. Carlisle, Deputy Clerk

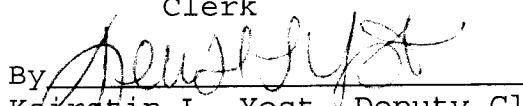
AO 136
(Rev 4/93)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
WESTERN DISTRICT OF PENNSYLVANIA) ss.
)

I, **ROBERT V. BARTH, JR.**, Clerk of the United States District Court for the Western District of Pennsylvania

DO HEREBY CERTIFY That **JOANNE M. BONACCI** was duly admitted to practice in said Court on July 2, 2007, and is in good standing as a member of the bar of said Court.

Dated at Pittsburgh, Pennsylvania ROBERT V. BARTH, JR.
Clerk
on April 2, 2008. By 
Keirstin L. Yost Deputy Clerk



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

JoAnne Marie Bonacci, Esq.

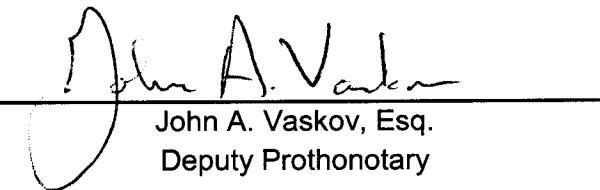
DATE OF ADMISSION

December 13, 1990

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: April 2, 2008**


John A. Vaskov, Esq.
Deputy Prothonotary

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA



I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That JoAnne M. Bonacci , Bar # 59392, was duly admitted to practice in said Court on November 12, 1993, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ
Clerk of Court

on April 2, 2008.

BY Aida Ayala
Aida Ayala, Deputy Clerk